

EXHIBIT 6

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

THE CITY OF HUNTINGTON,

Plaintiff,

v. CIVIL ACTION NO. 3:17-01362

AMERISOURCEBERGEN DRUG

CORPORATION, et al,

Defendants.

CABELL COUNTY COMMISSION,

Plaintiff,

vs.

AMERISOURCEBERGEN DRUG

CORPORATION, et al,

Defendants.

Videotaped and videoconference deposition of
ROCKY JOHNSON, taken by the Defendants pursuant to the
West Virginia Federal Rules of Civil Procedure, in the
above-entitled action, pursuant to notice, before Twyla
Donathan, Registered Professional Reporter and Notary
Public, at the Mountain Health Arena, ONE CIVIC CENTER
PLAZA, HUNTINGTON, WEST VIRGINIA, on the 26th day of June,
2020.

1 how to work drug cases. Past that point, when the pills
2 hit the street, I know how to work that, but -- and the
3 steps that, you know, we would take. But as far as how
4 they get from a prescription and then diverted from the
5 pharmacy, I've not done that.

6 Q So then would it be fair to say that the focus
7 of your department was on diverted pills on the street
8 rather than, you know, while they were still at the
9 pharmacy?

10 A Yeah. My job was after it was out, after it was
11 on the street, to get it back. You know, Craig, and his
12 assignment was different. I don't know what that
13 coordinator had him doing, you know, on the front end.
14 But once they hit the street, then that becomes my problem
15 where I'm better equipped for that.

16 Q Would you say it's more likely for prescription
17 opioids to be abused once they're in the hands of drug
18 dealers on the street?

19 MR. PENDELL: Objection to form.

20 You can answer.

21 A No, I think anywhere along the line they could
22 be abused by anybody that got their hands on them. You
23 don't have to be a drug dealer to abuse a prescription
24 drug.

1 You know, the common thing that I always heard
2 was -- and I interviewed a lot of people, formally and
3 informally over the years, and it was always: "I worked
4 in the timber industry, I was a coal miner, I worked in a
5 steel factory. I got injured. I took prescription pills.
6 My insurance ran out. I couldn't get the pills anymore.
7 I felt like I needed them, I switched over." That guy is
8 not a drug dealer, per se, what I'm looking for, but he's
9 still trying to obtain drugs that he's not entitled to, he
10 doesn't have a prescription for. He's not a drug dealer,
11 the way I look at it, but that's not a legal use of the
12 drug.

13 Q Have you talked to -- Could you talk a little
14 more about the individuals you've talked to who maybe this
15 began with a workplace injury, for example?

16 A I mean, I don't have anybody specific that I can
17 give you a name or bring in here to talk to you. But in
18 general, you know, we would arrest people that -- wouldn't
19 arrest people. We would go out on the street at night and
20 find --

21 The best case example I would give you on that
22 would be like a girl is working prostitution. We would go
23 out, we would see them, just pull over and talk to them,
24 not arrest them. Tell them, hey, we're not -- What's

1 going on? Try to get you into rehab. I got a phone
2 number I can give you. Try to get you into rehab.

3 And then the conversation -- Or maybe we did
4 arrest them. Maybe we arrest a girl for prostitution, and
5 I got her down at the police department, and the guys are
6 processing her, getting her fingerprints and things, and I
7 start talking to this girl, and I'm like, "How did you get
8 to this point? How -- you know, your veins are all
9 necrotic. You weigh about a hundred pounds. How did it
10 get to this point?"

11 And, you know, it usually started with, "I stole
12 pills out of my dad's -- my grandmother's medicine
13 cabinet. She had cancer and she had pain killers, so I
14 took pills from her and got addicted to it, and now I
15 can't get pills, and heroin is cheaper, so that's how I
16 got here."

17 That was a common thread. I mean, I heard that
18 from people involved in motor vehicle accidents. One time
19 a guy told me he fell off a ladder. Pressure washing the
20 side of his house and he falls off a ladder. Went to the
21 doctor, got pills, and then went downhill from there.

22 So, like I said, I don't have anybody I can take
23 you to. But that was a common thread. I heard that a
24 lot.